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VIA FACSIMILE TRANSMISSION TO 585-383-1496

June 18, 2019

David R. Morabito
Office of David R. Morabito
P.O. Box 187
117 West Commercial Street
East Rochester, NY 14445

RE: Morgan v. Concours Classic Motor Cars, Inc., et al., Case No. 6:18-cv-06778-FPG-MWP

Mr. Morabito:

Your client has not uploaded any photos since May 14, 2019 and he has never posted a manifest. The photographs do not represent enough items to fill a container. Based on this, on May 31, 2019, my client offered to allow the Defendant to transport the parts to a local holding area after an inspection of what was available to be shipped. Although you responded on June 4, 2019 with a promise to speak with your client on this matter, I have not heard from you since.

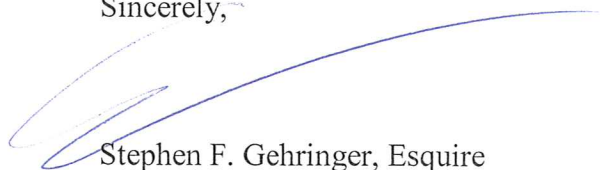
Your client's apparent inactivity since the middle of May and inability to keep any deadline gives me the impression that he will not honor this settlement. He is already in breach of the settlement for:

- (1) failing to provide manifest for the proposed May shipment;
- (2) failing to make a May shipment;
- (3) failing to prepare any shipment by June 15, 2019;
- (4) failing to prepare a manifest and photos for any June shipment

Let me know what he is up to with these shipments and when my client can have an agent come and inspect the parts that are available to be shipped. If there is a steady and reliable stream of activity on the part of your client to fulfill his obligations, I can counsel my client to be flexible with deadlines and show patience. However, another month of this may push him to seek relief in the courts.

Thank you.

Sincerely,

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke that extends to the right.

Stephen F. Gehringer, Esquire